

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEJAVUAI, INC., a Washington corporation,

Plaintiff,

v.

FYODOR “TED” KEPUSTIN aka FYDOR
“TED” KAPUSTINE, an individual
Defendant.

Cause No.2:25-cv-00915-JNW

**DECLARATION OF YAN SONG IN
SUPPORT OF DEFENDANT’S
COUNSEL’S MOTION TO
WITHDRAW**

**Note on Motion Calendar: June 24,
2025**

I, Yan Song, under penalty of perjury under the laws of the United States, state and declare as follows:

1. I am counsel for FYODOR “TED” KEPUSTIN aka FYDOR “TED” KAPUSTINE , the Defendant in the above captioned matter.
2. Professional considerations require that I withdraw from representation.
3. In particular, in my professional assessment, I do not believe I can provide effective representation to Defendant. I further believe that Defendant would be better served by other lawyers.
4. On June 2, 2025 via a Zoom meeting, I advised Defendant that I would need to withdraw from the case pursuant to the provisions of the representation agreement I entered into with him.

5. On the same day I filed Defendant's Counsel's Motion to Withdraw, I served Defendant via email.

Dated: June 3, 2025

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DATED: June 3, 2025 /s/ Yan Song